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Reply to: Edison

May 4, 2022

Via ECF only

André M. Espinosa, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut Street, Room 2037
Newark, NJ 07012

Re: Ramirez v. Smart Foods Inc et al.
Civil Action No.: 2:21-cv-12408

Dear Judge Espinosa:

I represent the defendants. In response to Plaintiff's counsel's letter of May 3, 2022, I object to a delay in the taking of Plaintiff's deposition, scheduled for May 6, 2022. It has been difficult to schedule Plaintiff and his sworn testimony should not be delayed or stayed. I otherwise do not object to Ms. Grunfeld's request leave to withdraw after May 6, 2022.

Respectfully submitted,

/s/ Arlindo B. Araujo

ARLINDO B. ARAUJO, ESQ.

Cc Counsel of Record (via ECF only)